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12 Attorneys for Defendant
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14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA

16 CONSUMER FINANCIAL
17 PROTECTION BUREAU,

18 Plaintiff,

19 v.

20 EXPERIAN INFORMATION
21 SOLUTIONS, INC.,

22 Defendant.

Case No. 8:25-cv-00024-MWC-DFM

**EXPERIAN INFORMATION
SOLUTIONS, INC.'S REQUEST
FOR JUDICIAL NOTICE IN
SUPPORT OF ITS MOTION TO
DISMISS THE COMPLAINT**

Date: May 9, 2025

Time: 1:30 p.m.

Place: Courtroom 6A

1 Pursuant to Federal Rule of Evidence 201, and in support of its concurrently
2 filed Motion to Dismiss, Defendant Experian Information Solutions, Inc. (“EIS”)
3 respectfully requests that the Court take judicial notice of the following documents:

4 1. The Consumer Financial Protection Bureau’s (the “Bureau”)
5 Supervisory Highlights: Spring 2014, which is publicly available on the Bureau’s
6 website at [https://www.consumerfinance.gov/data-research/research-](https://www.consumerfinance.gov/data-research/research-reports/supervisory-highlights-spring-2014/)
7 [reports/supervisory-highlights-spring-2014/](https://www.consumerfinance.gov/data-research/research-reports/supervisory-highlights-spring-2014/). A true and correct copy of this
8 document is attached as **Exhibit 1**.

9 2. The Bureau’s Supervisory Highlights: Winter 2015, which is publicly
10 available on the Bureau’s website at [https://www.consumerfinance.gov/data-](https://www.consumerfinance.gov/data-research/research-reports/supervisory-highlights-winter-2015/)
11 [research/research-reports/supervisory-highlights-winter-2015/](https://www.consumerfinance.gov/data-research/research-reports/supervisory-highlights-winter-2015/). A true and correct
12 copy of this document is attached as **Exhibit 2**.

13 3. The Bureau’s Supervisory Highlights Consumer Reporting Special
14 Edition: Issue 14, Winter 2017, which is publicly available on the Bureau’s website
15 at [https://www.consumerfinance.gov/data-research/research-reports/supervisory-](https://www.consumerfinance.gov/data-research/research-reports/supervisory-highlights-consumer-reporting-special-edition/)
16 [highlights-consumer-reporting-special-edition/](https://www.consumerfinance.gov/data-research/research-reports/supervisory-highlights-consumer-reporting-special-edition/). A true and correct copy of this
17 document is attached as **Exhibit 3**.

18 4. The Bureau’s Statement on Supervisory and Enforcement Practices
19 Regarding the Fair Credit Reporting Act and Regulation V in Light of the CARES
20 Act, dated April 1, 2020, which is publicly available on the Bureau’s website at
21 [https://www.consumerfinance.gov/compliance/supervisory-guidance/statement-](https://www.consumerfinance.gov/compliance/supervisory-guidance/statement-fair-credit-reporting-act-regulation-v-cares-act/)
22 [fair-credit-reporting-act-regulation-v-cares-act/](https://www.consumerfinance.gov/compliance/supervisory-guidance/statement-fair-credit-reporting-act-regulation-v-cares-act/). A true and correct copy of this
23 document is attached as **Exhibit 4**.

24 5. The Bureau’s November 9, 2020 response letter to National Consumer
25 Law Center’s Ms. Chi Chi Wu’s September 24, 2020 letter regarding the Bureau’s
26 April 1, 2020 policy statement. A true and correct copy of this document is attached
27 as **Exhibit 5**.

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1 6. The Bureau's Supervisory Highlights COVID-19 Prioritized
2 Assessments Special Edition: Issue 23, Winter 2021, which is publicly available on
3 the Bureau's website at [https://www.consumerfinance.gov/data-research/research-](https://www.consumerfinance.gov/data-research/research-reports/supervisory-highlights-covid-19-prioritized-assessments-special-edition-issue-23/)
4 [reports/supervisory-highlights-covid-19-prioritized-assessments-special-edition-](https://www.consumerfinance.gov/data-research/research-reports/supervisory-highlights-covid-19-prioritized-assessments-special-edition-issue-23/)
5 [issue-23/](https://www.consumerfinance.gov/data-research/research-reports/supervisory-highlights-covid-19-prioritized-assessments-special-edition-issue-23/). A true and correct copy of this document is attached as **Exhibit 6**.

6 7. The Bureau's Supervisory Highlights: Issue 24, Summer 2021, which is
7 publicly available on the Bureau's website at
8 [https://www.consumerfinance.gov/data-research/research-reports/supervisory-](https://www.consumerfinance.gov/data-research/research-reports/supervisory-highlights-issue-24-summer-2021/)
9 [highlights-issue-24-summer-2021/](https://www.consumerfinance.gov/data-research/research-reports/supervisory-highlights-issue-24-summer-2021/). A true and correct copy of this document is
10 attached as **Exhibit 7**.

11 8. The Bureau's Annual Report of Credit and Consumer Complaints,
12 January 2022, which is publicly available on the Bureau's website at
13 [https://www.consumerfinance.gov/data-research/research-reports/annual-report-](https://www.consumerfinance.gov/data-research/research-reports/annual-report-consumer-credit-reporting-complaints-analysis-of-complaint-responses-equifax-experian-transunion-2021/)
14 [consumer-credit-reporting-complaints-analysis-of-complaint-responses-equifax-](https://www.consumerfinance.gov/data-research/research-reports/annual-report-consumer-credit-reporting-complaints-analysis-of-complaint-responses-equifax-experian-transunion-2021/)
15 [experian-transunion-2021/](https://www.consumerfinance.gov/data-research/research-reports/annual-report-consumer-credit-reporting-complaints-analysis-of-complaint-responses-equifax-experian-transunion-2021/). A true and correct copy of this document is attached as
16 **Exhibit 8**.

17 9. The Bureau's Consumer Financial Protection Circular 2022-07, dated
18 November 10, 2022, which is publicly available on the Bureau's website at
19 [https://www.consumerfinance.gov/compliance/circulars/consumer-financial-](https://www.consumerfinance.gov/compliance/circulars/consumer-financial-protection-circular-2022-07-reasonable-investigation-of-consumer-reporting-disputes/)
20 [protection-circular-2022-07-reasonable-investigation-of-consumer-reporting-](https://www.consumerfinance.gov/compliance/circulars/consumer-financial-protection-circular-2022-07-reasonable-investigation-of-consumer-reporting-disputes/)
21 [disputes/](https://www.consumerfinance.gov/compliance/circulars/consumer-financial-protection-circular-2022-07-reasonable-investigation-of-consumer-reporting-disputes/). A true and correct copy of this document is attached as **Exhibit 9**.

22 In ruling on a motion to dismiss, the Court may consider the facts alleged in
23 the complaint, documents attached to the complaint, documents relied upon but not
24 attached to the complaint when authenticity is not contested, and matters of which
25 the Court takes judicial notice. *Lee v. City of Los Angeles*, 250 F.3d 668, 688–89 (9th
26 Cir. 2001). “Courts may judicially notice public documents.” *See St. John v. Toyota*
27 *Motor Corp.*, No. 10-ML-02151, 2013 WL 5775072, at *2 (C.D. Cal. Oct. 10, 2013)
28 (citing *Lee*, 250 F.3d at 689).

1 Here, the Court may properly take judicial notice of Exhibits 1–9 as
2 government reports and publications “are matters of undisputed public record” of
3 which the Court can take judicial notice. *See Quan v. Smithkline Beecham Corp.*, 149
4 F. App’x 668, 689 (9th Cir. 2005) (citing *Lee*, 250 F.3d at 689). Indeed,
5 “[g]overnment reports and publications, including information on the [Bureau’s]
6 official website [are] judicially noticeable.” *See Javaheri v. JPMorgan Chase Bank,*
7 *N.A.*, No. 10-cv-08185, 2011 WL 97684, at *2 (C.D. Cal. Jan. 11, 2011); *Gately v.*
8 *City of Port Hueneme*, No. 16-cv-04096, 2017 WL 8236269, at *3 (C.D. Cal. Oct. 2,
9 2017) (“Federal Rule of Evidence 201 permits judicial notice of public records and
10 government documents available from reliable sources on the internet, such as
11 websites run by governmental agencies.”); *U.S. ex rel. Modglin v. DJO Global Inc.*,
12 48 F. Supp. 3d 1362, 1381 (C.D. Cal. 2014) (taking judicial notice of publications
13 found on a government website in considering a motion to dismiss). Accordingly, the
14 Court may consider Exhibits 1–9 in ruling on EIS’s Motion to Dismiss.

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16 Dated: April 1, 2025

JONES DAY

17 By: /s/ Richard J. Grabowski
18 Richard J. Grabowski

19 Attorneys for Defendant
20 Experian Information Solutions, Inc.
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